REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 14, 16-21 and 23-34 are pending in this application.

Rejection Under 35 U.S.C. §103

Claims 14-34 were rejected under 35 U.S.C. §103 as allegedly being unpatentable

over the three-way combination of Bonjour et al[1] (hereinafter "Bonjour") in view of Lee

et al (hereinafter "Lee"), and further in view of Zhu. Applicant respectfully traverses this

rejection.

In order to establish a *prima facie* case of obviousness, all of the claim limitations

must be taught or suggested by the prior art. The combination of Bonjour, Lee and Zhu

fails to teach or suggest all of the claim limitations. For example, the combination fails to

teach or suggest "the URL comprising a circuit-switched identifier part identifying a

resource as being accessible via a circuit-switched network, an address part comprising

the address of the resource, and a service parameter part, wherein it is the circuit-

switched identifier part which identifies the specific type of circuit switched network via

which the resource is accessible, the service parameter part determines parameters of a

connection in the specific type of circuit switched network identified by the circuit-

switched identifier part to the resource, and the uniform resource locator has the format:

<circuit-switched identifier part>://<service parameter part>*<address part>

where * is a predetermined separator character," as required by independent claim 14.

Similar comments apply to independent claims 20, 21 and 27. The combination also fails

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[1] The Bonjour et al reference was cited in the International Search Report of corresponding Internahional application no. PCT/GB99/03834 as a category "A" (document defining the general state of the art which is not considered to be of particular relevance).

to teach or suggest "a) reading a uniform resource locator (URL), the URL comprising a circuit-switched identifier part identifying a resource as being accessible via a circuit-switched network, an address part comprising the address of the resource, and a service parameter part, wherein it is the circuit-switched identifier part which identifies the specific type of circuit switched network via which the resource is accessible and the uniform resource locator has the format: <circuit-switched identifier part>://<service parameter part>*<address part> where * is a predetermined separator character; and b) subsequently establishing a connection, in the specific type of circuit switched network identified by the circuit-switched identifier part, between the customer terminal and the resource, the connection having properties determined at least in part by one or more parameters contained in the service parameter part," as required by independent claim 28. Similar comments apply to independent claim 32.

Page 2, last paragraph of the Office Action admits:

"Bonjour did not expressly disclose the URL comprising a circuit-switched identifier part identifying a resource as being available via the circuit-switched network, an address part comprising the address of the resource, and a service parameter part, wherein it is the circuit-switched identifier part which identifies the specific type of circuit switched network via which the resource is accessible."

Lee and Zhu fail to resolve this admitted deficiency of Bonjour. Page 3, lines 1-4 of the Office Action alleges "Lee discloses the URL comprising...a service parameter part, wherein it is the *circuit-switched identifier part* which identifies the specific type of circuit switched network via which the resource is accessible (<host<a>, refer to page 9) (emphasis added)." Applicant respectfully disagrees with this allegation. The complete URL disclosed in page 9 of Lee is "http://<Host<a>>:...." The part <Host<a>> is thus

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scheme dependent information of scheme http, a protocol which is suitable for use in relation to <u>packet-switched networks (as opposed to circuit-switched networks)</u>. Lee does not relate to operations in <u>circuit-switched networks</u>, let alone a circuit-switched identifier part which identifies a specific type of circuit-switched network via which a resource is accessible. It thus follows that Lee also does not teach or suggest a <u>service parameter part</u> that determines parameters of a connection in the specific type of *circuit switched network identified by the circuit-switched identifier part* as further required by claim 14 or "establishing a connection, in the *specific type of circuit switched network identified by the circuit-switched identifier part*, between the customer terminal and the resource, the connection having properties determined at least in part by one or more parameters contained in the <u>service parameter part</u> (emphasis added)," as required by claim 28.

In additional to the HTTP protocol identified by Lee on page 9, Lee elsewhere specifically refers to FTP, MAILTO and various other protocols. However, each of these protocols is specifically designed for, and only suitable for use in, <u>packet-switched networks</u>. None of the protocols referred to in Lee have any relevance in relation to <u>circuit-switched networks</u>. Accordingly, Lee fails to resolve the admitted deficiencies of Bonjour. The allegation on page 3, lines 1-4 of the Office Action that "Lee discloses the URL comprising...a service parameter part, wherein it is the circuit-switched identifier part which identifies the specific type of circuit switched network via which the resource is accessible" is erroneous. Lee makes no reference to using URLs to establish connections in a circuit switched network, such as an ATM network.

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Moreover, since Lee only discloses the use of packet-switched networks, Lee teaches away from claimed invention requiring a circuit-switched identifier part of a uniform resource locator, the part identifying the specific type of circuit-switched network via which a resource is accessible. Lee does not disclose a URL comprising a circuit-switched identifier part and/or a service parameter part which determines connection parameters in the specific type of *circuit switched network* identified by the circuit-switched identifier part, as alleged on page 3, lines 1-5 of the Office Action. The alleged motivation for combining Bonjour and Lee ("utilizing the URL and benefit of internet can adapted by the end user to whom they are already familiar with the internet technology, furthermore, it can take advantages of all the ATM network capabilities") indicated on page 3, lines 7 *et seq.* of the Office Action is clearly based on improper hindsight reasoning as Lee teaches away from circuit-switched networks.

Moreover, Applicant submits that there is no teaching, suggestion or motivation to combine the three references of Bonjour, Lee and Zhu to teach or suggest the claimed limitation of a uniform resource locator having the format:

<circuit-switched identifier part>://<service parameter part>*<address part> where * is a predetermined separator character, as apparently alleged by the Office Action. It thus appears that the Office Action alleges that these three references are being combined for the teaching of this single claim limitation alone. As noted above, Lee's explicit and exclusive disclosure of packet-switched networks teaches away from a circuit-switched identifier part. Moreover, Zhu merely discloses using URLs for replacing telephone numbers. It appears that there is no information or part needed beyond those portions of

Zhu's URL for establishing a call between the internet and telephone network. Applicant thus submits that the combination of Zhu's parts with other information (e.g., <address part>) is clearly based on hindsight reasoning. Indeed, the only teaching of the URL having the above claimed format is Applicant's own disclosure.

With respect to dependent claims 18, 19, 25 and 26, page 2, last paragraph of the Office Action admits that "Bonjour did not expressly disclose the URL comprising...and a service parameter part." Accordingly, it is not understood how Bonjour could possibly disclose or suggest a service parameter part of a URL indicating a connection topology (claims 18 and 25) or a connection bandwidth (claims 19 and 26) as alleged on page 4 of the Office Action. That is, since Bonjour admittedly fails to disclose a service parameter part of a URL, Bonjour also fails to disclose a service parameter part of a URL indicating a connection topology or bandwidth.

Accordingly, Applicant requests that the rejection of claims 14-34 under 35 U.S.C. §103 over the three-way combination of Bonjour, Lee and Zhu be withdrawn.
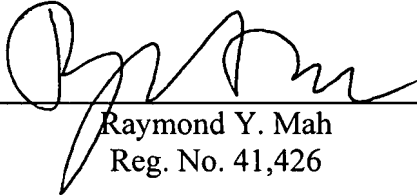
Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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By: _____

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